## THE LAW FIRM OF

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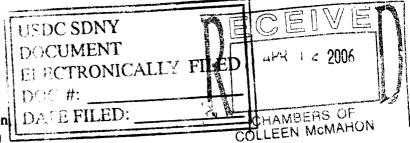
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April 12, 2006

By Fax (914) 390-4152 Hon. Colleen McMahon U.S. Courthouse 300 Quarropas Street, Room 533 White Plains, N.Y. 10601-4150

Re: Vasquez, et al. v. Torres-Negron 06 Civ. 0619 (CM) (S.D.N.Y.)



Dear Judge McMahon:

I am writing you on behalf of Plaintiffs in the above captioned action to request an extension of time to respond to the motion of Defendant Fernando Torres-Negron to dismiss the action pursuant to Fed.R.Civ.P. 12(b)(2), (3) and (6) on the grounds of lack of personal jurisdiction, improper venue and failure to state a claim. Dk. Nos. 6-9. Plaintiffs' request an extension until May 1, 2006.

Defendant's motion was filed on April 5, 2005. Dk. Nos. 6-9. The response is due April 19, two weeks later. There have not been any prior requests for additional time to respond to this motion. I spoke to Defendant's counsel by telephone and informed him that I would be requesting an extension. He did not say that he opposed the request. A pretrial conference is scheduled for May 19.

I am the attorney handling this action for Plaintiffs. The reason for the request is that I am on vacation until April 17 and upon my return am engaged in a hearing on April 19 at the American Arbitration Association arbitration (which started in March) in the matter entitled <u>Inspired Corp. v. Brain Damage Films</u>.

Under the circumstances, it is respectfully requested that Plaintiffs be granted to and including May 1, 2006 to respond to Desendant's pending motion to dismiss (Dk. Nos. 6-9).

Respectfully

ames B. Sheinbaum

cc: William R. Bennett, III, Esq. Fax No. (646) 328-0121

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